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Congress of the United States
House of Representatives

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July 18, 2023

Quinn Li
Senior Vice President & Global Head
Qualcomm Ventures
5775 Morehouse Dr.
San Diego, CA 92121

Carlos Kokron
Vice President & Managing Director
Qualcomm Ventures
5775 Morehouse Dr.
San Diego, CA 92121

Dear Mr. Li and Mr. Kokron,

We write to express serious concern and to request information about Qualcomm Venture's (QV) investments in artificial intelligence (AI) and semiconductor companies in the People's Republic of China (PRC), as well as any investments QV has made in PRC-based quantum computing firms. The PRC is actively seeking out and using advancements in AI to perpetrate human rights abuses and enhance its military capabilities. It is likewise using advancements in quantum computing and semiconductor manufacturing to support the People's Liberation Army (PLA).

China's policy of military-civil fusion (军民融合)—which “eliminat[es] barriers between the PRC's civilian research and commercial sector and its military and defense industrial sectors”—ensures that no technology company in China is truly a private company.¹ American venture capital and private equity investments in PRC AI, quantum, and semiconductor companies directly contribute to the PRC's human rights abuses, military modernization, expansion of authoritarianism around the globe, and the PRC's overall effort to supplant U.S. technological leadership.

PRC-based AI companies such as Yitu, Megvii, SenseTime, and CloudWalk have all been linked to China's efforts to profile and track Uyghurs—“ushering in a new era of automated racism.”² The PLA also leverages China-based AI to modernize its military, such as for intelligent and autonomous vehicles, geospatial imagery analysis, warfare simulations and training, military

¹ U.S. State Department, “Military-Civil Fusion and the People's Republic of China,” <https://www.state.gov/wp-content/uploads/2020/05/What-is-MCF-One-Pager.pdf>.

² Paul Mozur, “One Month, 500,000 Face Scans: How China Is Using A.I. to Profile a Minority,” New York Times, April 2019, <https://www.nytimes.com/2019/04/14/technology/china-surveillance-artificial-intelligence-racial-profiling.html>.

maintenance, logistics, and more.³ Qualcomm Ventures made at least 13 investments in the PRC's AI sector from 2015 to 2021, including in SenseTime.⁴ QV also invested in Zongmu, a PRC-based firm focused on self-driving vehicles that operates at an industrial park that lists as one of its focuses "promoting the development of military-civilian integration."⁵ QV's investments in PRC-based AI companies have continued as recently as the spring of 2022 when QV participated in a funding round of Shanghai-based computer vision startup Gantu AI.⁶ QV has touted its decades of involvement in what it called the PRC's "remarkable" mobile and wireless community, involving AI, robotics, and Internet of Things.⁷

Like AI, the domestic development of semiconductors is a top priority of the Chinese Communist Party.⁸ Semiconductors are essential for artificial intelligence, quantum computing, and other advanced dual use technology.⁹ QV has invested in Denglin Technology, a PRC-based GPU AI chip start up.¹⁰ Qualcomm Ventures has also advised and directed investment activities of the Strategic China Venture Fund, which Qualcomm Incorporated created to invest in Chinese startups.¹¹ Semiconductor investments are a strategic priority for the Venture Fund.¹² The PRC also uses quantum computing for military applications including counter-stealth, counter-submarine, and breaking encryption.¹³

Accordingly, please respond to the following questions no later than August 1, 2023:

1. Please list the name of each company that is researching or developing products or services related to artificial intelligence or machine-learning, semiconductors, or quantum

³ Akashdeep Arul, "How China is using AI for warfare," Center for Security and Emerging Technology, February 2022, <https://cset.georgetown.edu/article/how-china-is-using-ai-for-warfare/>.

⁴ CSET, "U.S. Outbound Investment into Chinese AI Companies," <https://cset.georgetown.edu/publication/u-s-outbound-investment-into-chinese-ai-companies/>; Kane Wu and Julie Zhu, "Chinese AI startup SenseTime to file for Hong Kong IPO by end-August -sources," <https://www.reuters.com/article/sensetime-ipo-idCNL4N2PQ003>.

⁵ China Daily, "Shaanxi-Shanghai Aviation and Passenger Vehicle Industry Cooperation Symposium Was Successfully Held in Xi'an," <http://ex.chinadaily.com.cn/exchange/partners/77/rss/channel/cn/columns/13ti2f/stories/WS636efc67a3109bd995a4f8c2.html>; FJSen, "Jimei Anren Industrial Park Was Completed and Put Into Use," http://xm.fjsen.com/2022-09/15/content_31132123.htm.

⁶ Semiconductor Engineering, "Startup Funding: April 2022," <https://semiengineering.com/startup-funding-april-2022/>.

⁷ Qualcomm Ventures, "Portfolio Watch: We're Investing in Nine Chinese AI and IoT Startups," <https://insights.qualcommventures.com/portfolio-watch-were-investing-in-nine-chinese-ai-and-iot-startups-bf531af3df80>.

⁸ CSET, "Translation of 14th Five Year Plan," https://cset.georgetown.edu/wp-content/uploads/t0284_14th_Five_Year_Plan_EN.pdf.

⁹ *Id.*

¹⁰ "China's GPU startup company Denglin Technology wins a new round of strategic finance, consolidating its leading position in AI computing," <https://jw.ijiwei.com/n/804815>.

¹¹ CSET, "U.S. Outbound Investment into Chinese AI Companies," <https://cset.georgetown.edu/publication/u-s-outbound-investment-into-chinese-ai-companies/>.

¹² Qualcomm, "Qualcomm Commits Up To \$150 Million to Strategic Venture Fund in China," <https://investor.qualcomm.com/news-events/press-releases/detail/640/qualcomm-commits-up-to-150-million-to-strategic-venture>.

¹³ U.S. Commerce Department, "Commerce Lists Entities Involved in the Support of PRC Military Quantum Computing Applications, Pakistani Nuclear and Missile Proliferation, and Russia's Military," <https://www.commerce.gov/news/press-releases/2021/11/commerce-lists-entities-involved-support-prc-military-quantum-computing>.

computing or quantum information systems that QV – or any affiliated investment vehicles or personnel – has invested in that is either based in or has significant operations in the PRC. Please provide each company name in both English and Chinese. If any of these investments were into holding companies or similar investment vehicles, please also provide the English and Chinese names of the relevant operating company(ies).

2. For each company listed in response to Question 1:
 - a. Please state the dollar amount that QV invested in each listed company, and the date(s) of such investment(s) in each company.
 - b. Please describe any business or management expertise or advice that QV has provided or expects to provide to the relevant company.
 - c. Please identify whether QV, or affiliated personnel, is entitled to exercise control or influence over the company. Please describe how such responsibility, control, or influence may be exercised.
 - d. Please explain the relevant factors that were used to assess the investment and to make the decision to proceed with the investment. Please also identify the risk factors identified, and whether any of those risk factors related to national security or human rights concerns.
 - e. Please state whether the listed company was receiving or has since received funding or revenue from any PRC-affiliated, state-owned, or state-backed entity.
 - i. Please specifically state whether any Chinese government entity or state-owned entity was listed in the company's capitalization table at the time the investment was made, and if so, please provide the name of such entity in English and Chinese.
 - f. Please describe the role or influence of the CCP or PRC Government at the company, including (but not limited to) any known Party committees at the company, sales to or collaboration with PRC Government entities, or alignment of corporate research or development efforts with CCP or PRC Government technology priorities.
 - i. Please produce copies of all documents and correspondence in your possession or control related to the subject matter of this question.
3. Please produce all of QV's internal policies and procedures that relate to how QV decides whether to invest in a company that is either based in or has significant operations in the PRC. Please produce both PRC-specific and general QV policies and procedures that informed the decision to invest in each company listed in response to Question 1.
 - a. Please describe, and provide documents evidencing, any compliance mechanisms that QV has put in place to ensure that such investments comport with all relevant

legal restrictions in the United States and with QV's internal policies.

4. Please describe the risk factors QV considers during the due diligence process when considering an investment in a company that is based in or has significant operations in the PRC.
 - a. With respect to each company listed in response to Question 1, did any QV personnel or outside consultant raise questions or concerns regarding the substance or the reputational risks related to human rights, national security or similar concerns? Please describe the questions and concerns and any objections to proceeding with the investment and produce all related documents.
5. How has, or how would, QV respond if the U.S. government placed a company that QV invests in on a sanctions or trade restriction list, such as the Commerce Department's Entity List? Please describe any mitigation measures QV may have in place for such a scenario.

The House Select Committee on the Strategic Competition Between the United States and the Chinese Communist Party has broad authority to "investigate and submit policy recommendations on the status of the Chinese Communist Party's economic, technological, and security progress and its competition with the United States" under H. Res. 11. Upon your receipt of this letter, please maintain and preserve all hard copy and electronic documents, including electronic communications, related to the subject matter of this letter.

To make arrangements to deliver a response, please contact Select Committee staff at (202) 226-9678 (Majority) and (202) 225-2489 (Minority).

Thank you for your attention to this important matter and prompt reply.

Sincerely,



Mike Gallagher
Chairman



Raja Krishnamoorthi
Ranking Member